

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT
AND TO DEEM HER RESPONSE OPPOSING SUMMARY JUDGMENT
TIMELY FILED, *NUNC PRO TUNC***

COMES NOW Defendant Latasha Kebe (hereinafter referred to as “Ms. Kebe”), by and through undersigned Counsel, and, pursuant to Fed. R. Civ. P. 6(b)(1)(B), moves this Honorable Court for an Order finding that Ms. Kebe’s late submission of her Response Opposing Plaintiff’s Motion for Summary Judgment was the result of excusable neglect; granting an extension of time to respond to Plaintiff’s Motion for Summary Judgment (ECF No. 92); and deeming Ms. Kebe’s Response Opposing Plaintiff’s Motion for Summary Judgment, filed on January 25, 2021 (ECF No. 115-120), as timely filed, *Nunc Pro Tunc*.

In support of this motion, Ms. Kebe contemporaneously submits, and incorporates herein, a Brief in Support of Motion for Extension of Time, the

Affidavit of Olga Izmaylova (Exhibit 1), and the Affidavit of Sadeer Sabbak (Exhibit 2), as well as any subsequent briefing and arguments made to, and with the permission of, this Court.

WHEREFORE, Ms. Kebe, pursuant to Fed. R. Civ. P. 6(b)(1)(B), respectfully moves this Honorable Court for an Order:

- (1) finding that Ms. Kebe's late submission of her Response Opposing Plaintiff's Motion for Summary Judgment was the result of excusable neglect;
- (2) granting Ms. Kebe's Motion for Extension of Time to Respond to Plaintiff's Motion for Summary Judgment, *Nunc Pro Tunc*;
- (3) deeming Ms. Kebe's Response Opposing Plaintiff's Motion for Summary Judgment, filed on January 25, 2021, as timely filed, *Nunc Pro Tunc*; and
- (4) awarding Ms. Kebe any additional relief the Court deems just and appropriate.

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 11th day of February, 2021.

/s/Olga Izmaylova
olga@silawatl.com
Georgia State Bar No. 666858

/s/Sadeer Sabbak
ssabbak@silawatl.com
Georgia State Bar No. 918493

SABBAK & IZMAYLOVA, P.C.
1875 Old Alabama Road
Suite 760
Roswell, Georgia 30076
p. (404) 793-7773
f. (678) 878-4911

Attorneys for Latasha Kebe

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2021, I electronically filed the foregoing DEFENDANT KEBE'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AND TO DEEM HER RESPONSE OPPOSING SUMMARY JUDGMENT TIMELY FILED, *NUNC PRO TUNC*, and the accompanying BRIEF IN SUPPORT OF KEBE'S MOTION FOR EXTENSION OF TIME; AFFIDAVIT OF OLGA IZMAYLOVA; and AFFIDAVIT OF SADEER SABBAK with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/Olga Izmaylova
olga@silawatl.com
Georgia State Bar No. 666858

SABBAK & IZMAYLOVA, P.C.
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